

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Jennifer Artesi f/k/a Jennifer Tapscott
Plaintiff

v.

1:19-cv-00214-AJ

DeMoulas Super Markets, Inc. d/b/a
Market Basket AND Dennis Labatte
Defendants

**PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE
OBJECTION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
AND MEMORANDUM OF LAW**

NOW COMES the Plaintiff, Jennifer Artesi, by and through her attorney, Law Office Of Leslie H. Johnson, PLLC, and submits Plaintiff's Assented-To Motion to Extend Deadline To File Objection to Defendants' Motion for Summary Judgment and Memorandum of Law, and in support thereof, respectfully states as follows:

1. Defendants filed their Motion for Summary Judgment and Memorandum of Law (DN 16) on December 30, 2019 with Plaintiff's Objection due by January 29, 2020.
2. Plaintiff's counsel has a second objection to summary judgment in an unrelated case due on the same date with another one having been due on 1/17, as well as two depositions and two mediations on 1/21, 1/24, 1/27, and 1/30 respectively, which do not leave adequate time for counsel to prepare Plaintiff's Objection.
3. Due to same, counsel needs additional time to file the objection and memorandum, and requests an extension to February 10, 2020, which is a negotiated date as the request to counsel was for February 19, 2020.
4. This brief extension will not impact the trial schedule, nor would it prejudice the parties.
5. Defense Counsel has been contacted and assents to this extension request.
6. No memorandum of law is required, as this request is within the Court's discretion.

WHEREFORE, Plaintiff, Jennifer Artesi respectfully requests this Honorable Court:

- A. Grant Plaintiff an extension to February 10, 2020 to file her Objection to Defendants' Motion for Summary Judgment, with Memorandum of Law; and
- B. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,
Jennifer Artesi, Plaintiff
By Her Attorney

Dated: January 23, 2020

By: /s/ LESLIE H. JOHNSON
Leslie H. Johnson, Esquire – NH Bar No. 5545
LAW OFFICE OF LESLIE H. JOHNSON, PLLC
PO Box 265
Center Sandwich, NH 03227
(603) 284-6600
leslie@lesliejohnsonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the above to be electronically served through ECF this date to those on the ECF service list.

/s/ LESLIE H. JOHNSON
Leslie H. Johnson, Esquire